

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

LA UNIÓN DEL PUEBLO ENTERO, et al.,
Plaintiffs,

v.

GREGORY W. ABBOTT, et al.,
Defendants.

5:21-cv-844-XR (Consolidated)

LULAC TEXAS, et al.,
Plaintiffs,

v.

JANE NELSON, et al.,
Defendants.

1:21-cv-0786-XR

LULAC PLAINTIFFS’ DESIGNATION OF GENERAL ELECTION EXPERT

Pursuant to Federal Rule of Civil Procedure 26(a)(2); the Amended Scheduling Order (ECF No. 437); and this Court’s February 8, 2023 Order (ECF No. 518), Plaintiffs LULAC Texas, Voto Latino, Texas Alliance for Retired Americans, and Texas AFT (“LULAC Plaintiffs”) submit the following disclosure of expert witnesses who have prepared a written report in compliance with Federal Rule of Civil Procedure 26(a)(2)(B) that LULAC Plaintiffs will serve upon all parties on February 10, 2023:

1. Dr. Loren Collingwood, PhD.

Dr. Collingwood is an Associate Professor of Political Science at the University of New Mexico. Dr. Collingwood is expected to provide testimony regarding the race and ethnicity of voters in several Texas counties. Dr. Collingwood was retained by LULAC Plaintiffs to provide expert testimony and may be contacted through undersigned counsel.

LULAC Plaintiffs reserve the right to alter, amend, revise, or expand the opinions and expert witness subjects set forth above as necessitated by further discovery or changes in Defendants' expert witness disclosures. By this disclosure, LULAC Plaintiffs do not waive their right to challenge the admissibility of the testimony of any experts listed by Defendants in their disclosures. LULAC Plaintiffs further note that under this Court's February 8, 2023 Order (ECF No. 518), their deadline to file any designation, and serve any report and accompanying materials required by Fed. R. Civ. P. 26(a)(2)(B), from Dr. Kenneth Mayer is February 20, 2023.

Dated: February 10, 2023.

Respectfully submitted,

/s/ Uzoma N. Nkwonta

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**Admitted Pro Hac Vice*

CERTIFICATE OF SERVICE

I hereby certify that on February 10, 2023, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of this filing to all counsel of record.

Respectfully submitted,

/s/ Uzoma N. Nkwonta

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